

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA,
ATLANTA DIVISION

IN RE CONAGRA PEANUT BUTTER	:	Civil Action No.
PRODUCTS LIABILITY LITIGATION	:	1:07-mdl-1845 TWT
	:	ALL CASES

Expert Witness Disclosure for Dr. Charles Stratton

1. My name is Charles William Stratton, IV, M.D. I am over the age of twenty-one (21) and am competent to testify to the facts stated herein. The affidavit is based on my personal knowledge and training.

2. I am a licensed Medical Doctor, License Number MD0000011948 in the State of Tennessee with specialty in the areas of internal Medicine and infectious disease. Since 1979, I have been active in the fields of internal Medicine and infectious disease as both an attending physician and as a consulting physician at Vanderbilt University Medical Center, Nashville Veteran's Administration Medical Center, St. Thomas Hospital and the Stallworth Rehabilitation Hospital. I have also served as the Director of the Clinical Microbiology Laboratory at the Vanderbilt University Hospital, and have taught infectious diseases and clinical microbiology to Vanderbilt University Medical Center medical students, residents, fellows, and other faculty members first as an Assistant Professor

of Medicine and then as a tenured Associate Professor of Medicine and Pathology.

3. My responsibilities as a physician in the medical specialties of internal medicine and infectious diseases have encompassed prevention, diagnosis and treatment in a variety of health care settings. I currently make Clinical Microbiology/Infectious Disease Rounds five days per week with Pathology Residents and Infectious Disease Fellows as well as do Clinical Microbiology/Infectious Disease Consultations as requested.

4. I graduated from the University of Vermont College of Medicine with a Doctor of Medicine degree in 1971. I completed my residency training in internal medicine at the University of Colorado Medical Center in 1974, and in 1976 completed a fellowship in infectious diseases and clinical microbiology at the University of Colorado Medical Center. I was board certified by The American Board of Internal Medicine in 1974, The American Board of Internal Medicine in the subspecialty of Infectious Disease in 1976, The American Board of Pathology in the subspecialty of Medical Microbiology in 1978, and The American Board of Medical Microbiology in Public Health and Medical Microbiology in 1979. My training and qualifications are more fully set out in my Curriculum

Vitae, which is attached hereto as Exhibit "1" and incorporated herein by reference.

5. My opinions set forth herein are based upon my professional training, knowledge and experience.

6. Salmonella is a known bacterial pathogen of humans. It is colorless, odorless, microscopic and not detectable by normal senses.

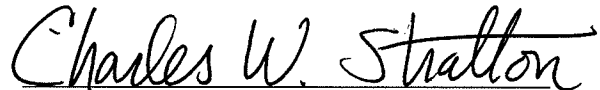
7. Salmonella is a bacteria that lives in the intestines on warm blooded animals, including birds and rodents. Salmonella are transmitted from animal to human or from human to human. Humans are infected with Salmonella almost solely by the ingestion of contaminated food or drink.

8. Salmonella is well known to the food industry. When Salmonella is ingested, the bacteria multiply in the small intestines and colon. The typical clinical course of Salmonella infection is characterized by fever, abdominal pain, and diarrhea that persist for three to five days. Nausea and vomiting are common initial symptoms. These conditions typically subside within five days, but may last for as long as two weeks. Most Salmonella infections follow a mild to moderate course without appreciable morbidity or mortality. However, serious illness is common in infants, in the elderly, and in persons with underlying diseases. Dehydration consequent to diarrhea may

lead to serious complications. Patients typically develop symptoms within one to two days, but there have been reports of patients developing symptoms as early as six hours or as late as several weeks after ingestion.

9. Other known human bacterial food borne pathogens present clinically in a similar manner, and likewise are found in the intestines of warm blooded animals.

10. Ingestion of a tiny amount of food contaminated with Salmonella or other similar pathogens can result in infection.


Charles W. Stratton, MD